

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

CASEY INGELS,

Debtors.

NO. 14-10421MLB

ADV. NO. 14-01387MLB

JOHN S. PETERSON, the Chapter 7 Trustee for  
the Estate of CASEY INGELS

Plaintiff,

v.

CASEY INGELS,

Defendants.

PLAINTIFF'S PRETRIAL STATEMENT

Plaintiff, JOHN S. PETERSON as Trustee, presents his Pretrial Statement pursuant to Local Rule 7016-1(b) and this Court's February 23, 2015 Amended Notice of Trial and Order Setting Deadlines and states as follows:

**I. Jurisdiction**

A. The Court has jurisdiction over this matter pursuant to 28 USC 157 and 1334.

B. Venue is proper pursuant to 18 USC 1409.

C. This is a core proceeding pursuant to 28 USC 157(b)(2).

**II. Claim for Relief.**

Plaintiff's Prehearing Statement - Page 1 of 3

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1 Plaintiff requests denial of the debtor's discharge pursuant to 11 USC 727(a)(4) and alleges the  
2 debtor made a false statement regarding a material fact and that the false statement was made  
3 knowingly and fraudulently.

4 **III. Admitted Facts.**

5 Plaintiff admits the following facts:

- 6 1. The Defendant filed a Chapter 7 bankruptcy petition on January 23, 2015.
- 7 2. The Defendant amended his bankruptcy schedules and related documents on January 24,  
8 2014, April 18, 2014 and November 17, 2014. In the November 17, 2014 amendment, the  
9 Defendant disclosed the existence of the MJ Ray Ingels Irrevocable Trust and indicated it  
10 was not property of the bankruptcy estate.
- 11 3. The Defendant appeared at a 341 meeting on March 11, 2014, and provided testimony  
12 under oath at that hearing.

13 **IV. Issues of Law.**

14 Did the Defendant knowingly and fraudulently provide false statements under oath at the 341  
15 meeting held on March 11, 2014, regarding the funding of the MJ Ray Ingels Family  
16 Irrevocable Trust, property at 9830 Dekoven, Lakewood, Washington, transfers of the property  
17 to and from the trust and to MJB Consulting LLC and/or his knowledge of MJB Consulting,  
18 LLC?

19 **V. Witnesses.**

20 John Peterson-PO Box 829, Kingston, WA 98346-360-626-4392-will testify to administration of  
21 the bankruptcy case and 341 meeting of March 11, 2014.

22 Casey Ingels-PO Box 2242, Tacoma, WA 98401-will testify regarding statements made at 341  
23 meeting which occurred March 11, 2014.

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